

ARM Group LLC

Engineers and Scientists

January 6, 2021

Ms. Barbara Brown
Project Coordinator
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

Re: Comment Response Letter:
Work Plan Update Letter
Project Liberty Area (Revision 1)
Area B: Parcel B13
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is pleased to provide the following response to a comment provided by the Maryland Department of the Environment (MDE) via email on November 19, 2020 regarding the previous submission of the Pre-Development Supplemental Investigation Work Plan Update Letter (Revision 0 dated November 5, 2020) for a designated portion of Parcel B13 (the Site) of the TPA property located in Sparrows Point, Maryland.

The Work Plan Update Letter has been revised and is provided accompanying this Comment Response Letter. The response to the MDE's comment is given below; the original comment is included in italics with the response following.

- 1. The previously approved Work Plan identified B13-086-PZ and B13-092-PZ as locations for groundwater sampling. Both of the locations have already been completed as soil borings. What is the reason they were not also sampled for groundwater at that time or soon thereafter? Evidence of NAPL was observed in the boring or B13-086-PZ and therefore the piezometer was installed for NAPL gauging. Once the location was determined to be free of NAPL, was it sampled? If not, please add that location back into the plan for groundwater sampling.*

Shortly after fieldwork was initiated in 2018, the investigation was placed on hold indefinitely because of reduced interest in occupying the Site. The two locations were initiated as soil borings, but due to refusal/borehole collapse the piezometers were not installed at that time. A

second attempt was not made to complete the groundwater sampling in 2018 due to the investigation being placed on hold.

Location B13-092-PZ was previously proposed as a groundwater sample location; however, as noted previously a piezometer was not installed in 2018. After considering the redistribution of the proposed sample locations (resulting from the modification to the site boundary), a piezometer is proposed to be installed and sampled at location B13-088-PZ, which is proximate to location B13-092-SB.

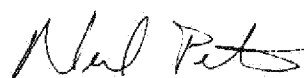
As described in the NAPL Completion Report for Area B: Parcel B13 (B13-086-PZ), dated September 17, 2020, an attempt was made to install a NAPL screening piezometer at B13-086-PZ on December 12, 2018, but was unsuccessful due to borehole collapse. The investigation was subsequently placed on hold, and a piezometer was not installed in 2018. However, the Site was revisited on June 9, 2020 and a NAPL screening piezometer was installed, gauged, and subsequently abandoned on July 23, 2020. The NAPL screening piezometer was not sampled for groundwater because of reduced interest in occupying the Site as noted previously. However, based on the renewed interest in the Site and as requested by the MDE, a new piezometer will be installed and sampled at this location. This modification is reflected in the revised Work Plan Update Letter text and **Figure 9**.

If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group LLC at 410-290-7775.

Respectfully Submitted,
ARM Group LLC



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T. Neil Peters, P.E.
Senior Vice President

